

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No: 20-CR-10012-IT
)	
PAUL BATEMAN,)	
Defendant.)	

ASSENTED-TO MOTION FOR EXCLUSION OF TIME
UNDER THE SPEEDY TRIAL ACT

The United States of America, by and through the undersigned Assistant United States Attorney, respectfully moves this Court to exclude the time period from July 21, 2021 through and including November 12, 2021 from the speedy trial clock, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), on the ground that the ends of justice served by excluding this period outweigh the best interests of the public and the Defendant in a speedy trial.

In support of this request, the government states that, following this Court’s denial of the defendant’s Motion to Compel Discovery on July 20, 2021, a status conference was scheduled and eventually held on August 12, 2021. During this conference, the parties reported on the status of their ongoing communication regarding the potential resolution or other trajectory of the case, and the defendant reported that he would likely file a motion to suppress certain evidence. With the agreement of the parties, the Court scheduled an October 16, 2021 deadline for filing motions to suppress. Both parties agreed to exclude the time from the Speedy Trial Act through that date. The Court has allowed the defendant’s assented-to motion to extend that filing date until November 12, 2021, for the reasons cited in the motion (Doc. 91). The parties jointly agree that this period constitutes “the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” and that the ends of justice served by granting the requested continuance

outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). Counsel for the defendant assents to this motion, which the government files to memorialize the in-court agreement at the parties' last appearance.

Respectfully submitted,

NATHANIEL R. MENDELL
Acting United States Attorney

By: /s/ Anne Paruti
Anne Paruti
Assistant United States Attorney

Date: September 20, 2021

CERTIFICATE OF SERVICE

I, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Anne Paruti
Assistant United States Attorney

Dated: September 20, 2021